

**Exhibit D 1**

7-23  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

STEPHEN McCULLOM, et al.,  
Plaintiffs,

v.

BRAD LIVINGSTON, et al.,  
Defendants.

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CIVIL ACTION NO. 3:12-CV-02037

**DEFENDANT UNIVERSITY OF TEXAS MEDICAL BRANCH'S  
AMENDED RESPONSES TO PLAINTIFF SANDRA McCOLLUM'S  
FIRST REQUESTS FOR PRODUCTION**

TO: Sandra McCollum, by and through her attorney of record, Jeff Edwards and Scott Medlock, The Edwards Law Firm, 1101 E. 11th Street, Austin, Texas 78702 and Brian McGiverin and Wayne Krause-Yang, Texas Civil Rights Project, 4920 N. IH-35, Austin, Texas 78751.

The University of Texas Medical Branch, Defendant in the above-styled and numbered cause, offers the following Amended Responses to Plaintiff's First Requests for Production.


Respectfully submitted,

GREG ABBOTT  
Attorney General of Texas

DANIEL T. HODGE  
First Assistant Attorney General

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ATTORNEYS FOR DEFENDANT  
UNIVERSITY OF TEXAS MEDICAL BRANCH

CERTIFICATE OF SERVICE

I, KIM COOGAN, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing Defendant University of Texas Medical Branch's Amended Responses to Plaintiff Sandra McCollum's First Requests for Production has been served by placing same in the United States Mail on the 23<sup>rd</sup> day of April, 2014, addressed to:

Jeff Edwards  
Scott Medlock  
The Edwards Law Firm  
1101 E. 11th Street  
Austin, Texas 78702

**CMRRR 7008 0500 0001 5047 6423**

Brian McGiverin  
Wayne Krause-Yang  
Texas Civil Rights Project  
4920 N. IH-35  
Austin, Texas 78751

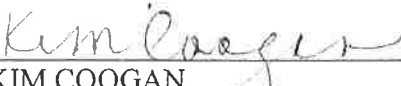
**CMRRR 7008 0500 0001 5047 6430**

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(Via Hand Delivery)

Demetri Anastasiadis  
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\_\_\_\_\_  
KIM COOGAN  
Assistant Attorney General

**RESPONSE TO REQUEST FOR PRODUCTION**

9. Please produce all documents related to the inmate heat injury in any TDCJ facility where UTMB provides medical care between 2007 and 2012.

**RESPONSE: OVERBROAD.** This request is over broad in both scope and time. This request is vague as to "the heat injury". This request is vague as to the documents it seeks. UTMB is not in the care, custody or control of records created by law enforcement, TDCJ or other entities. Please see attached disc containing e-mails.